

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

NORTHERN STATES POWER COMPANY, )  
Plaintiff, )  
v. ) Case No. 10-CV-780  
ASSOCIATED ELECTRIC & GAS INSURANCE )  
SERVICES LIMITED, )  
Defendant. )  
ASSOCIATED ELECTRIC & GAS INSURANCE )  
SERVICES LIMITED, )  
Third-Party Plaintiff, )  
v. )  
ADMIRAL INSURANCE COMPANY; ALLSTATE )  
INSURANCE COMPANY; NORTHWESTERN NATIONAL )  
INSURANCE COMPANY; CENTURY INDEMNITY )  
COMPANY; COLUMBIA CASUALTY COMPANY; )  
CONTINENTAL INSURANCE COMPANY; TIG INSURANCE )  
COMPANY; CERTAIN UNDERWRITERS AT LLOYD'S, )  
LONDON; CERTAIN LONDON MARKET INSURERS; )  
FAIRMONT SPECIALTY INSURANCE COMPANY; ST. PAUL )  
MERCURY INSURANCE COMPANY; and ST. PAUL FIRE )  
AND MARINE INSURANCE COMPANY, )  
Third-Party Defendants. )

---

**CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, AND CERTAIN  
LONDON MARKET INSURANCE COMPANIES' ANSWER TO  
CROSSCLAIMS FILED BY THIRD-PARTY DEFENDANTS AND  
CROSSCLAIM AGAINST ALL THIRD-PARTY DEFENDANTS**

NOW COME Third-Party Defendants, Certain Underwriters at Lloyd's, London and Certain London Market Insurance Companies (hereinafter "London Market Insurers") as specifically identified in their Appearance dated June 15, 2011, appearing individually, each for his, her or its own part and not one for another and only insofar as their several interests appear

on one or more of the contracts of insurance at issue in AEGIS Insurance Services, Inc.'s ("AEGIS") Third-Party Complaint ("Third-Party Complaint"), by and through their undersigned counsel, and submit the following Answer to Crossclaims filed by Third-Party Defendants Fairmont Specialty Insurance Company, TIG Insurance Company, Continental Insurance Company, Columbia Casualty Company, Admiral Insurance Company and Century Indemnity Company, and their Crossclaim against all Third-Party Defendants:

**ANSWER TO CROSSCLAIMS**

1. London Market Insurers reallege and incorporate by reference their Answer and Affirmative Defenses to the Third-Party Complaint.
2. London Market Insurers deny they are liable for the Crossclaims filed by Third-Party Defendants for contribution, indemnification, subrogation, equitable subrogation or otherwise in connection with AEGIS' claims in the Third-Party Complaint.

**CROSSCLAIM AGAINST ALL THIRD-PARTY DEFENDANTS**

1. London Market Insurers reallege and incorporate by reference their Answer and Affirmative Defenses to the Third-Party Complaint.
2. London Market Insurers allege that if they are found liable as alleged in the Third-Party Complaint, they are entitled to contribution, indemnification and/or subrogation as against Third-Party Defendants.

WHEREFORE, Third-Party Defendants London Market Insurers pray for judgment as follows:

1. Judgment in favor of London Market Insurers and against Third-Party Defendants, dismissing Third-Party Defendants' Crossclaims with prejudice;
2. A declaration that London Market Insurers have no obligation for defense or indemnity costs incurred by NSP, AEGIS or Third-Party Defendants with

respect to environmental contamination at or near the former manufactured gas plant known as Owen Park, in Eau Claire, Wisconsin;

3. In the alternative, a declaration of the respective rights and obligations of the parties pursuant to the subject insurance policies, for defense or indemnity costs incurred by NSP, AEGIS or Third-Party Defendants with respect to environmental contamination at or near the former manufactured gas plant known as Owen Park, in Eau Claire, Wisconsin;
4. An award to London Market Insurers of their attorneys' fees and costs; and
5. An award to London Market Insurers of any other relief the Court deems just and proper.

June 29, 2011

Respectfully Submitted,

/S/ Christopher J. Johnson

BECK, CHAET, BAMBERGER & POLSKY, S.C.

Patrick T. Walsh, # 6202062  
Timothy G. Furrow # 6277502  
HINKHOUSE WILLIAMS WALSH LLP  
Firm I.D. No. 44633  
180 N. Stetson Ave., Suite 3400  
Chicago, IL 60601  
Phone: (312) 784-5400

Christopher J. Johnson, #1008961  
BECK, CHAET, BAMBERGER & POLSKY,  
S.C.  
Two Plaza East, Suite 1085  
330 E. Kilbourn Avenue  
Milwaukee, WI 53202  
Phone: (414) 273-4200

Attorneys for Defendants Certain Underwriters at Lloyd's, London and Certain London Market Insurance Companies